

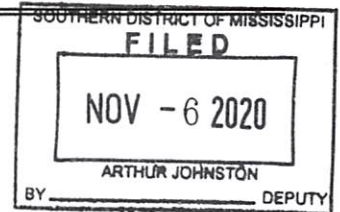
Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

____ Northern ____ Division



George Berry Jr.

Case No. 3:20-cv-717-CWR-LRA
(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Labor Finders Inc
ESIS Insurance Company

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	George Berry Jr
Street Address	6716 Franklin Roosevelt Dr.
City and County	Jackson Hinds
State and Zip Code	Mississippi 39213
Telephone Number	(601)-291-5193
E-mail Address	Gbj2014.GB@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name	Abraham Lopez
Job or Title (<i>if known</i>)	ESIS (Chubb Insurance/Ace American Insurance Company)
Street Address	225 E John W Carpenter Fwy #1300
City and County	Irving Dallas
State and Zip Code	Texas 75062
Telephone Number	(197) 246-5750
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	Labor Finders Inc. (Robyn Hammond)
Job or Title (<i>if known</i>)	Director of Risk Management
Street Address	LFI FT. PIERCE, INC. DBA LABOR FINDERS PO BOX 1380
City and County	Lake Worth Palm Beach
State and Zip Code	Florida 33460
Telephone Number	(180) 086-4774
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	Labor Finders International, Inc.
Job or Title (<i>if known</i>)	
Street Address	11426 Jog Rd
City and County	Palm Beach Gardens Palm Beach County
State and Zip Code	Florida 33418
Telephone Number	(800) 864-7749
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	ESIS
Job or Title (<i>if known</i>)	
Street Address	PO Box 6563
City and County	Scranton Lackawanna
State and Zip Code	Pennsylvania 18505
Telephone Number	(800) 937-7460
E-mail Address (<i>if known</i>)	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	Labor Finders Inc
Street Address	741 Harris St. Suite A
City and County	Jackson Hinds
State and Zip Code	Mississippi 39202
Telephone Number	(601) 362-6677

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law *(specify the federal law)*:

Equal Pay Act (EPA) , The Genetic Information Nondiscrimination Act



Relevant state law *(specify, if known)*:



Relevant city or county law *(specify, if known)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☐ Retaliation.
- ☒ Other acts *(specify)*: EEOC Charges

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
10-31-2019 to 04-06-2020

C. I believe that defendant(s) *(check one)*:

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

- ☐ race _____
- ☐ color _____
- ☐ gender/sex _____
- ☐ religion _____
- ☐ national origin _____
- ☐ age *(year of birth)* _____ *(only when asserting a claim of age discrimination.)*
- ☒ disability or perceived disability *(specify disability)*
On the job Injury to my left hand and wrist

E. The facts of my case are as follows. Attach additional pages if needed.

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On the job injury to my left hand and wrist , denied proper medical treatment from Labor Finders and ESIS Insurance Company, during therapy bones in my wrist were broken which I have to wear a plastic case fo pain. I have in order documents that starts back from the day of the injury up until the present day.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

April 30,2020

- B. The Equal Employment Opportunity Commission *(check one)*:

☐

has not issued a Notice of Right to Sue letter.

☒

issued a Notice of Right to Sue letter, which I received on *(date)* 08/10/2020 .

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐

60 days or more have elapsed.

☐

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Im 49 I have 14 years left to work at 50,000.00 a year equals 700,000.00

My Left Hand and Wrist confirmed by my physical therapist will never be the same again my motor skills and sessions are like starting all over and it was traumatic that happen to a hand I use to write with everyday I think 400,000.00 would be for my left hand and wrist.

I have documents to prove that Labor Finders and ESIS Insurance Company coerce Certified physicians to not treat me, and cut my workman compensation benefits I would like the Court to Order 15,000,000.00 dollars from ESIS Insurance Company. And I Would like the Court to Order 10,000,000.00 dollars from Labor Finders inc.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/06/2020

Signature of Plaintiff

Printed Name of Plaintiff

George Berry Jr.

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address